

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA**

DEBTOR: Billy D. Early and Phylesa A. Early

CASE NO. 14-14515

**MOTION TO EXTEND AUTOMATIC STAY
NOTICE OF OPPORTUNITY FOR HEARING**

COME now the Debtors and show the Court as follows:

1. Debtors filed a Chapter 13 case in the Western District of Oklahoma on April 10, 2014, in case number 14-11507.
2. The case was dismissed on June 25, 2014.
3. The debtors needed to complete and file tax returns for five years and were unable to do so while the case was pending. The debtors have completed and filed all of the past due tax returns as well the current years tax return.
4. On October 29, 2014, Debtors filed the instant case.
5. Debtors request the Court impose the automatic stay pursuant to 11 U.S.C. §362(c)(3)(B).
6. The case has been filed in good faith based upon the following facts:
 - a. The debtors have completed the tax returns that prevented their previous case from being confirmed.
 - b. The debtors are able to make the plan payments and requested an income assignment in the new plan.
 - c. The debtors did not significantly delay in refiling the case to cause creditors to incur any significant additional costs.
 - d. The debtors did not incur any new debts in the nature of luxury items or vacations.
 - e. Debtors are proposing a plan in good faith.

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Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 14 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

WHEREFORE, the Debtors respectfully requests that the Court extend the automatic stay.

s/Christopher A. Wood
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